

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION

LAUREN BLAZER, ERICA SPIRES, and,	)	
DAVID SANZ	)	
	)	
Plaintiffs,	)	
	)	No. 3:18-CV-00097
v.	)	
	)	JUDGE: Greer
BUDDY GREGG MOTOR HOMES, LLC,	)	MAGISTRATE: Guyton
	)	
Defendant.	)	

STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF BUDDY GREGG MOTOR  
HOMES, LLC's MOTION FOR SUMMARY JUDGMENT WITH RESPECT TO PLAINTIFF  
DAVID SANZ' CLAIM FOR INTENTIONAL INTERFERENCE WITH BUSINESS  
RELATIONS

Buddy Gregg Motors Homes, LLC ("Buddy Gregg"), by undersigned counsel, submits it statement of undisputed fact in support of its motion for partial summary judgment, as follows:

1. Plaintiff David Sanz ("Sanz") began working as a salesperson for Tennessee RV in December of 2017. (Amended Complaint ¶ 116.)
2. Sanz was discharged from Tennessee RV on March 20, 2018. (Exh. 57.)
3. Buddy Gregg Technician Paul Chapman ("Chapman") overheard Buddy Gregg Service Manager Eric Bivens ("Bivens") speaking to a Tennessee RV Service Manager named James. (Chapman Dep. 70.)
4. During the conversation referenced in statement 3 Sanz' name came up. (Chapman Dep. 71.)
5. Chapman "Really couldn't tell" if Bivens was speaking favorably or unfavorably of Sanz because there were several "yes and no questions" and Chapman heard only Bivens, not James. (Chapman Dep. 71.)

6. During the conversation Bivens asked James if “the one trying to sue us” was still with Tennessee RV. (Chapman Dep. 73.)
7. At the time Chapman had the impression Bivens was speaking of Sanz, but Plaintiff Lauren Blazer was also employed at Tennessee RV. (Chapman Dep. 73.)
8. Chapman is not sure whether Bivens was referring to Sanz or Blazer. (Chapman Dep. 73.)
9. Tennessee RV Sales Manager Jason Rees was the person who decided to discharge Sanz and the one who informed Sanz of the discharge. (Rees Aff. ¶¶ 2-3; Sanz Dep. 120-21.)
10. Rees made the decision himself and had no input from anyone associated with Buddy Gregg. (Rees Aff. ¶ 3.)
11. Rees had no contact or communication from anyone with Buddy Gregg in connection with his decision. (Rees Aff. ¶ 3.)

Respectfully submitted this 22nd day of July, 2019.

/s/ Howard B. Jackson

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**CERTIFICATE OF SERVICE**

I certify that the foregoing Statement of Undisputed Facts in Support of Buddy Gregg Motor Homes, LLC's Motion for Summary Judgment with Respect to Plaintiff David Sanz' Claim of Intentional Interference with Business Relations was served on the following persons, via the Court's electronic filing system, this 22nd day of July, 2019:

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/s/ Howard B. Jackson

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